

A community nursing bureau operated as a community project, which maintains a nonprofit register of qualified nursing personnel, including graduate nurses, unregistered nursing school graduates, licensed attendants and practical nurses, for the benefit of hospitals, health agencies, doctors and individuals, which receives its primary financial support from various community organizations and public contributions, qualifies for exemption under the provisions of section 501(c)(3) of the Internal Revenue Code of 1954.

Advice has been requested whether a community nursing bureau, which maintains a nonprofit register of qualified nursing personnel and receives substantial financial support from various community organizations and public contributions, qualifies for exemption under section 501(c)(3) of the Internal Revenue Code of 1954.

The instant organization was formed as a result of a study by the nursing council of a metropolitan area, a constituent agency of the health and welfare council of that area, in cooperation with civic and professional groups, to broaden the scope of service rendered by existing nurses' registers which was inadequate as a general community activity. The organization was established to operate a central directory of qualified nursing personnel, both professional and nonprofessional, in addition to the official nurses directory which continues to operate in the area. It is controlled by a board of directors drawn principally from public health and welfare organizations and the public at large.

The activities of the organization consist of operating a nonprofit registry for qualified nursing personnel including graduate nurses, unregistered nursing school graduates, licensed attendants and practical nurses. The activities include receiving applicants for registration, determining whether the applicants meet qualification standards, classifying and registering qualified applicants, and operating the registry so as to assure a prompt supply of qualified responsible nursing personnel in response to calls from hospitals, health agencies, doctors and individuals.

The organization is supported primarily by contributions from individuals and community organizations such as the community chest and local hospitals. Such contributions are supplemented by registration fees. Expenditures are for salaries and office expenses. No part of the net income inures to the benefit of any private individual.

In view of the foregoing, it is apparent that the purposes and activities of the organization are directed to the relief of conditions relating to the health of the community, which is a matter of public concern, rather than those of a professional

society. Accordingly, it is held that a community nursing bureau operated as a community project, which maintains a nonprofit register of qualified nursing personnel, including graduate nurses, unregistered nursing school graduates, licensed attendants and practical nurses, for the benefit of hospitals, health agencies, doctors and individuals and which receives its primary financial support from various community organizations and public contributions, qualifies for exemption under the provisions of section 501(c)(3) of the 1954 Code.